

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

CHRISTOPHER C. JOHNSON,

Plaintiff,

v.

TUCKER ALBIN AND ASSOCIATES, INC.;
REGUS MANAGEMENT GROUP LLC,

Defendants.

CASE NO. 3:23-cv-05928-BHS

DEFENDANT REGUS
MANAGEMENT GROUP LLC'S
ANSWER TO PLAINTIFF'S
COMPLAINT

Regus Management Group, LLC ("Regus") hereby files its Answer to the Complaint ("Complaint") [Doc. No. 4] and respectfully states the following:

I. SPECIFIC RESPONSES TO ALLEGATIONS IN COMPLAINT

1. Regus is mentioned in only two instances in the Complaint: in paragraphs 7 and 52. All of the substantive claim and allegations in the Complaint are asserted against, and regarding the alleged conduct of, Tucker Albin and Associates, Inc. ("Tucker Albin"). In paragraph 52 of the Complaint, Plaintiff conclusorily alleges that "[t]he act(s) and omission(s) of Tucker Albin . . . are imputed to Regus Management Group LLC." On November 21, 2023, Plaintiff filed a dismissal with prejudice regarding all claims against Tucker Albin.

2. Regarding numbered paragraph 5 of the Complaint, Regus admits that, based on Regus' last knowledge and belief, Tucker Albin is a Texas corporation.

DEFENDANT REGUS MANAGEMENT GROUP
LLC'S ANSWER TO PLAINTIFF'S
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#5495620 v1 / 01378-002

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3. Regarding numbered paragraph 7 of the Complaint, Regus admits that it is a Delaware corporation.

4. Regus denies the allegations in numbered paragraph 52 of the Complaint.

5. With regard the allegations in all other numbered paragraphs of the Complaint, Regus lacks knowledge or information sufficient to form a belief about the truth of such allegations and therefore same are denied.

II. AFFIRMATIVE DEFENSES

Regus asserts the following additional matters:

Plaintiff's claims are subject to arbitration pursuant to a written agreement between Plaintiff and Regus.

The Complaint fails to state one or more claims against Regus upon which relief may be granted under FED. R. CIV. P. 12(b)(6).

Regus specifically denies that any alleged acts or omissions of Tucker Albin may be imputed to Regus or that Regus is legally responsible any alleged acts or omission of Tucker Albin.

WHEREFORE Regus respectfully requests that Plaintiff take nothing by its claims and such other and further relief to which Regus may be entitled.

Dated this 5th day of December, 2023.

s/ Jacques E. St. Romain

Jacque E. St. Romain, WSBA #44167

s/ Joshua R.M. Rosenberg

Joshua R.M. Rosenberg, WSBA #58365

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*Attorneys for Defendant Regus Management
Group LLC*

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2023, the foregoing document was electronically filed with the United States District Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Heather L. Hattrup

Heather L. Hattrup

Legal Assistant to Jacques E. St. Romain